

# Exhibit 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

United States of America \*  
ex rel. ALEX DOE, Relator, \* CIVIL ACTION NO. 2:21-CV-  
\* 00022-Z  
\*

The State of Texas \*  
ex rel. ALEX DOE, Relator \*

The State of Louisiana \*  
ex rel. ALEX DOE, Relator \*

Plaintiffs, \*  
V. \*

Planned Parenthood \*  
Federation of America, \*  
Inc., Planned Parenthood \*  
Gulf Coast, Inc., Planned \*  
Parenthood of Greater \*  
Texas, Inc., Planned \*  
Parenthood South Texas, \*  
Inc., Planned Parenthood \*  
Cameron County, Inc., \*  
Planned Parenthood San \*  
Antonio, Inc., \*

Defendants \*

\*\*\*\*\*

ORAL AND VIDEOTAPED DEPOSITION OF  
TEXAS HEALTH AND HUMAN SERVICES COMMISSION  
AND THE STATE OF TEXAS  
30(b)(6) EMILY ZALOVSKY  
DECEMBER 6, 2022

\*\*\*\*\*

1 A. I did.

2 Q. Okay. So I'll represent to you that  
3 Ms. Ghahremani, who's on this e-mail, Exhibit 20,  
4 testified that the Heather referenced in this e-mail is  
5 Heather Fleming who was working in the speaker's office  
6 as the speaker's health care policy person at the time.

7 A. Okay.

8 MR. BRISSENDEN: Object to form.

9 A. I understand.

10 Q. So why was the speaker's office on  
11 communications regarding Planned Parenthood claims in  
12 August of 2015?

13 MR. BRISSENDEN: Object to the form --

14 MR. STEPHENS: Object to form.

15 MR. BRISSENDEN: -- of the question and to  
16 scope, and caution you not to -- if you know the answer  
17 and can answer without divulging communications with the  
18 legislative office and the speaker's office, answer. But  
19 caution you not to divulge communications that you had,  
20 if you had any, with the speaker's office, because that  
21 would be subject to the legislative privilege.

22 A. So I can't speculate on why Lisa was talking to  
23 them. I don't know the answer.

24 Q. Did you personally have any communications with  
25 the speaker's office regarding Planned Parenthood in this